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0056006

02-RCA-098

DEC 18 2001

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Air Emissions and Defense Waste Section
Division of Radiation Protection
Washington State Department of Health
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Mr. J. Leitch, Chief
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U. S. Environmental Protection Agency
Region 10
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Mr. O. S. Wang
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336

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EDMC

Addressees:

DOE/RL-2001-69, REVISION 0, CATEGORICAL RADIOACTIVE AIR EMISSIONS NOTICE OF CONSTRUCTION (NOC) FOR ROOF REPLACEMENT ACTIVITIES INVOLVING RADIOACTIVE CONTAMINATION AT FACILITIES ON THE CENTRAL PLATEAU

Enclosed is a copy of the subject NOC application, which is being submitted to the U. S. Environmental Protection Agency (EPA), Region 10, and the Washington State Department of Health (DOH), Division of Radiation Protection, for approval pursuant to Title 40, Code of Federal Regulations (CFR), Part 61.07 and Washington Administrative Code (WAC) 246-247-060. With the EPA's approval, this application will also provide initial start-up notification pursuant to 40 CFR 61.09 (a)(1).

For the activities described in this NOC, which entail roof replacement activities involving removal or disturbance of radioactive contamination for any facility on the Central Plateau of the Hanford Site, the estimated unabated total effective dose equivalent (TEDE) to the hypothetical, maximally exposed individual is less than 0.05 millirem per year. The estimated abated TEDE to the MEI is less than 0.01 millirem per year.

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Also enclosed is a Notification of Off-Permit Change to incorporate the NOC for potential radioactive air emissions from re-roofing activities. This information is being provided to the State of Washington Department of Ecology consistent with their role as lead for the Hanford Site Air Operating Permit.

If you have any questions regarding this matter, please contact Astrid P. Larsen, of my staff, on (509) 372-0477.

Sincerely,



Joel Hebdon, Director
Regulatory Compliance and Analysis Division

RCA:APL

Enclosures

cc w/encls:

R. Engelmann, FHI

R. Gay, CTUIR

R. Gurske, FHI

G. LeBaron, FHI

R. Jim, YN

J. Perry, FHI

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P. Sobotta, NPT

M. A. Wilson, Ecology

Environmental Portal, LMSI

Administrative Record

HANFORD SITE AIR OPERATING PERMIT

Notification of Off-Permit Change

Permit Number: 00-05-006

This notification is provided to Washington State Department of Ecology, Washington State Department of Health, and the U.S. Environmental Protection Agency as notice of an off-permit change described as follows.

This change is allowed pursuant to WAC 173-401-724(1) as:

1. Change is not specifically addressed or prohibited by the permit terms and conditions
2. Change does not weaken the enforceability of the existing permit conditions
3. Change is not a Title I modification or a change subject to the acid rain requirements under Title IV of the FCAA
4. Change meets all applicable requirements and does not violate an existing permit term or condition
5. Change has complied with applicable preconstruction review requirements established pursuant to RCW 70.94.152.

Provide the following information pursuant to WAC-173-401-724(3):

Description of the change:

A Radioactive Air Emissions Notice of Construction, *Categorical Radioactive Air Emissions Notice of Construction for Roof Replacement Activities Involving Radioactive Contamination at Facilities on the Central Plateau*, Revision 0, is being submitted to the Washington Department of Health (Health) and the U.S. Environmental Protection Agency (EPA) for approval. A change in the Hanford Site Air Operating Permit is required to incorporate this new potential source of air emissions.

Date of Change:

Effective date will be the later of the two approvals by Health or EPA.

Describe the emissions resulting from the change:

Radioactive air emissions with an annual limit of 0.05 mrem (unabated) to the Maximally Exposed Individual (MEI) and 0.01 mrem (abated) to the MEI..

Describe the new applicable requirements that will apply as a result of the change:

Applicable requirements will be identified in approval notifications by Health and EPA.

For Hanford Use Only:

AOP Change Control Number:

Date Submitted: